

October 3, 2006

Michael Dart
General Counsel
Indiana Department of Local Government Finance

Dear Mr. Dart:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with LSA Document 06-172 proposed by the Department of Local Government Finance ("DLGF"). The proposed rule amends 50 IAC 15 to alter the continuing education requirements for the assessor-appraiser certification program. The rule increases continuing education requirements for persons desiring to maintain their Level One and Level Two assessor-appraiser certification. The rule would affect any business that employs a Level One or Level Two assessor-appraiser. The DLGF estimates that the number of small businesses impacted would be fewer than 50 state-wide.

The impact analysis prepared by DLGF states that although the proposed rule changes increase continuing education requirements, the necessary courses are offered by DLGF at no cost. Other educational programs provide continuing education courses on a fee basis, and affected individuals also have the option of participating in these programs in order to comply with the rule. The DLGF estimates that there will be minimal administrative costs incurred through compliance with the rule, consisting primarily of copying and mailing costs and time spent away from work.

The IEDC does not object to the economic impact associated with this rule. The costs associated with the rule appear reasonable and the rule changes will help make improvements to the state's assessor-appraiser system.

If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,



Ryan Asberry
Director – Research
Indiana Economic Development Corporation

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